

United States Department of Agriculture

Forest Service Manti-La Sal **National Forest** Supervisor's Office 599 West Price River Drive Price, UT 84501 Phone # (435) 637-2817 Fax# (435) 637-4940

File Code: 2820-4

Date: January 22, 2002

Ms. Pamela Grubaugh-Littig **Permit Supervisor** Utah Division of Oil, Gas and Mining P.O. Box 145801 Salt Lake City, UT 84114-5801

Dear Pam:

My staff has reviewed the documents related to the Miller Canyon Phase I Bond Release which were recently sent to us by Henry P. Austin of the Office of Surface Mining in Denver. The review has focused on the potential impacts to water and riparian resources in Miller Canyon, with the goal of ensuring that monitoring will detect any changes in water quality or quantity in Miller Canyon. I feel that the water monitoring proposed in your Decision Document, dated November 19, 2001, will be sufficient to detect potential changes with a few minor modifications. It is our understanding that the following parameters will be tested once a year in June:

- 1. flow
- 2. pH
- 3. total suspended solids (TSS)
- 4. total dissolved solids (TDS)
- 5. iron (total and dissolved)
- 6. oil and grease
- 7. alkalinity, bicarbonate
- 8. alkalinity, carbonate
- 9. calcium
- 10. chloride
- 11. conductivity
- 12. hardness
- 13. magnesium
- 14. manganese (total and dissolved)
- 15. potassium
- 16. sodium
- 17. sulfate

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DIVISION OF OIL, GAS AND MINING



18. Utah Class 3D parameters

In general, these sampling parameters are adequate. However, the following changes must be made to clarify the sampling requirements and to clearly demonstrate compatibility with post-mining land use.

- 1. The laboratory used for the analyses must have detection levels compatible with the Utah 3A parameters.
- 2. Sampling must be done in the spring and fall. A two-week window must be identified, and sampling must be done during that period each year.
- 3. The sampling must be done at the confluence of the discharge from the 3 portals. Sampling will not be done during or immediately after storms when the discharge water would be diluted by storm water.
- 4. The water quality must meet the criteria for Class 3A, not 3D. Cottonwood Creek is tributary to Straight Canyon Creek, which is a Class 3A stream.
- 5. The sampling parameters to be tested each year must be modified to include all of the RCRA metals.
- 6. The sampling data must be sent to the UDOGM database, with a notice to the Forest Service that the data have been put into the database.
- 7. If water quality data show that any parameter is exceeded, it must be retested within 30 days.
- 8. Two photopoints must be selected, one covering the riparian area where the discharge water enters the stream and one downstream, to document riparian conditions. Digital photos must be taken each time the water is sampled. The photos must be entered into the database along with the water quality data.

Please call Dale Harber or Carter Reed if you have any questions.

Sincerely,

EDAINE J. ZIEROTH Forest Supervisor

cc:

Henry P. Austin Reclamation Specialist USDI – Office of Surface Mining 1999 Broadway, Suite 3320 Denver, CO 80202-5733